UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: May 30, 2000

SUBJECT: Hukill Chemical Corporation (Hukill)

FROM: Rae Trine, Environmental Scientist
Air Enforcement and Compliance Assurance Section
(MN/OH)

TO: Files

THRU: William MacDowell, Section Chief
Air Enforcement and Compliance Assurance Section
(MN/OH)

Date and Time of Inspection:

March 8, 2000 10:30 am

Plant Address and Contact:

Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146-4493

www.hukill.com

Fred Valins, Environmental, Health and Safety Manager
Phone #: (440) 232-9400

Participants:

Fred Valins, EHS Manager

Rae Trine, Environmental Scientist, U.S. EPA (Air)

Kevin Vuilleumier, Environmental Engineer, U.S. EPA (Air)

Purpose and Scope of Inspection:

The purpose of this inspection was to determine the facility's compliance with the Clean Air Act and the federally approved Ohio State Implementation Plan (SIP) and gather further information to determine the company's applicability to the Off-site Waste MACT.

Arrival and Opening Conference:

U.S. EPA inspectors arrived at Hukill at 10:30 a.m. on Wednesday, March 8,2000, for an unannounced inspection. All participants met in a conference room, where Rae Trine and Kevin Vuilleumier of the U.S. EPA provided credentials. Fred Vilans, EHS Manager at Hukill, agreed to accompany the inspectors around the facility and show them the process operations dealing specifically with air releases. Mr. Vilans was reminded that if any information was to remain confidential that he should let the U.S. EPA inspectors know so it could be duly noted. (Note: inspectors were out of the small business fact sheets at the time of the inspection. Mr. Vilans was faxed the fact sheet when inspectors returned to the office the following week).

Mr. Vilens indicated that Hukill was a natural minor and was not a major source for HAPs and therefore, were not subject to the Off-site Waste MACT. According to Hulkil's Facility Information Book (revised: 3/7/2000) given to the inspectors, various permits issued to the Company include: Federal EPA ID Number - OHD001926740; Notification of CERCLA approval - Letter of Acceptance; Ohio Hazardous Waste Facility Installation and Operation Permit - 02-18-0315; Industrial User Administrative Order - #2911-360-SIU-R3; City of Bedford, Dept. of Public Safety - Division of Fire Permits - #0003500; and Ohio EPA Air Permits that were observed at the facility are indicated in the table below. (Note: according to Hukill, renew applications were submitted in 1997.)

Permit to Operate #	Description	Date of Issuance
P007	Bulk Tank Truck Loading Facility	10/21/94
P008	Bulk Tank Truck Loading Facility	10/21/94
T049	16,000 gal. VOC mat. storage tank	10/21/94
T050	6,000 gal. VOC sol. storage tank	10/21/94
T068	16,000 gal. VOC sol. storage tank	10/21/94
T077	15,900 gal. proc. fuel blend tank	9/2/94
T078	10,400 gal. VOC dist. storage tank	8/26/94
T079	10,400 gal. VOC dist. storage tank	8/26/94
T080	10,400 gal. VOC dist. storage tank	8/26/94
T081	10,400 gal. VOC dist. storage tank	8/26/94

T082	10,400 gal. VOC dist. storage tank	8/26/94
T083	12,100 gal. VOC dist. storage tank	8/26/94
T089	12,100 gal. VOC dist. storage tank	8/26/94
T090	11,600 gal. VOC dist. storage tank	8/26/94
T091	11,600 gal. VOC dist. storage tank	8/26/94
T092	10,400 gal. VOC dist. storage tank	8/26/94
T093	10,400 gal. VOC dist. storage tank	8/26/94
T095	10,400 gal. VOC dist. storage tank	8/26/94
T096	10,400 gal. VOC dist. storage tank	8/26/94
T097	10,400 gal. VOC dist. storage tank	8/26/94
T100	12,100 gal. VOC dist. storage tank	8/26/94
P012 PTI - Modification	Air Stripping Process to remove VOC from contaminated stormwater	9/23/98

General Facility and Process Description:

(Note: most of the information describing the facility comes from the Hulkil's Facility Information Book (rev. 3/7/2000)). Hukill was established in 1947 as a manufacturer's representative to the paint industry. The company started the recycling of used solvents in 1952. The current facility was constructed in 1968 and is located on 8.56 acres in a commercial-industrial area.

The business is approximately 40% chemical distribution and 60% hazardous waste management. Hukill's SIC codes are 5169 (chemical distribution) and 7389 (solvent recovery service). Hukill employs approximately 50+ personnel and the facility's hours of operation are 24 hours per day, 7 days per week. There are three shifts operating with the 2nd and 3rd shift consisting of nothing but skeleton crews.

Hukill is a distributor of chemical products from major manufacturers, as well as a custom formulator and blender. As a permitted treatment, storage and disposal facility (TSDF), Hukill provides a comprehensive waste management program including solvent reclamation, fractional distillation, and blending and sorting of hazardous and non-hazardous waste materials for

disposal.

Distribution Capabilities: liquid solvents, acids, alkalies and salts are stocked materials; custom blending and processing of virgin solvents or acids to exact specifications.

Reclamation and Fractional Distillation Capabilities: spent non-chlorinated and chlorinated solvents are accepted in bulk and drums for recycling. A sample is always required for evaluation before material can be accepted for reclamation or fractionation. All hazardous waste is sampled and tested, and compared to incoming manifest and waste data profile sheets. The actual recycling process is exempt from permitting. However, the proper storage of hazardous waste materials, along with the proper storage (supplemental fuel program) of the distillation bottoms, are permitted and regulated.

Lab Capabilities: all analysis includes testing for BTU's, chlorides, flash point, acidity/pH, water content, compatibility with Hukill's typical supplemental fuels material, and GC scan. Equipment used in testing are gas chromatographs, Karl Fisher Aquameter, Seta Flash point tester, Parr Bomb-Calorimeter, and Pilot Distillation Units.

Disposal Capabilities: fuel blending of pumpable, dispersible, semi-solid and solid waste materials with sufficient BTU value for supplemental fuels conversion; thermal destruction of solid hazardous and non-hazardous materials not amenable to fuels blending, but acceptable for incineration; non-fuel disposal of low BTU hazardous and non-hazardous wastewater, non-hazardous oils, waste inks, waste paints, non-hazardous solids and liquids; other disposal services include caustics, acids, aerosols and lab pack services.

Hukill has a few restrictions which include: PCB's, herbicides, pesticides, and biocides. There is no incineration, fuels burning, or landfill treatment conducted on the premises.

Facility Tour:

Hukill representatives gave US EPA inspectors a tour of the facility. As inspectors walked through the plant they observed a site plan. Readers of this report may wish to refer to the site plan, which is included as Attachment 1. The inspection proceeded roughly from left to right, with respect to the site

plan.

Inspectors observed the Acid Tank Farm which included a tank used for spent acid storage. No visible leakage from the tanks was observed. Hukill indicated they have a Leak Detection Program in place in accordance with 40 CFR 63.691 and that the program is contracted out to an independent company who check for leaks as least once a month. Inspectors then proceeded to the Acid Department where custom blending takes place along with hazardous waste fuels blending.

Inspectors continued to the staging and storing areas at the containerized truck loading pad and flammable drum storage area. Inbound bulk liquid shipments are sampled, tested, and pumped to diked storage tanks permitted for hazardous waste. The permitted bulk storage inventory is 183,100 gallon capacity. Both the east warehouse storage and the off-loading areas for bulk liquids have curbed concrete containment. All containers (drums and totes) are checked with manifest, marked with the accumulation date, manifest number, customer code, etc. and placed in the permitted storage area in the east warehouse. Permitted storage inventory capacity is 55,000 gallons. Inspectors were told that all receiving records are logged to a computer database for waste tracking, and state and federal reporting.

Inspectors were led to the Solvent Recovery Facility where the major components of the solvent processing area included two thin-film evaporators, a fractional distillation column and a molecular sieve dryer. One of the two Luwa thin-film evaporators is a 43-square-foot unit and the other a 52-square-foot unit. Hukill's distillation range is extended by the Luwa's ability to process under vacuum. One of the Luwa units has the capability for hot oil distillation. The fractional distillation column gives the facility the means to recycle solvents into commercial grade product. There is also a batch still with a column 30 inches in internal diameter and 50 feet tall. The molecular sieve dryer was added in 1984. The dryer allows reduction in moisture levels in solvents to parts per million levels. At the time of the inspection, the Luwa unit was operating. There were no leaks or odors observed or detected.

Inspectors briefly observed the lab. It is a standard lab using gas chromatographic technology. Testing of all off-site material included analysis of BTU composition, chlorides, flash point, acidity/pH, water content, etc.

Finally, from the processing area, US EPA inspectors observed the processed solvent storage tank farm. Again, no visible leakage was detected by the inspectors. Hukill claims to have 19 hazardous waste tanks and 1000 (55 gallon) containers. There are also 8 or 9 slow sweep agitators in several of the tanks along with pumps and pressure relief devices. The tanks use quick couple connectors not the typical cam locks, since

Hukill feels the cam locks leak too much.

The facility has two small natural-gas fired boilers, each rated at 4 million BTU. Three cooling towers can also be found north of the facility.

Closing Conference/Exit Interview:

Inspectors conducted a brief exit interview that included a request for additional documentation to be sent to the US EPA, such as emission data from the air stripper (P012) and emission calculations for the HAPS emitted from the facility. Mr. Valins said he would get it to the us as soon as possible. US EPA inspectors indicated to Mr. Valins that follow-up materials may be requested from the company in the future.

Area of Concern/Need for Follow-up:

1) Review requested materials that are to be sent to the US EPA by Mr. Valins of Hukill.
2) Check status of PTIs and PTOs with the state of Ohio.
3) Check status of Company's proposed plans to add a second fractionation system (applied PTI, PTO etc.)